

Accepting Processed Product Documentation in the National School Lunch Program and School Breakfast Program

This guidance applies to the U.S. Department of Agriculture's (USDA) meal patterns meal patterns for grades K-12 and preschoolers (ages 1-4) in the U.S. Department of Agriculture's (USDA) National School Lunch Program (NSLP), School Breakfast Program (SBP), Seamless Summer Option (SSO) of the NSLP, and Afterschool Snack Program (ASP) of the NSLP. For information on the meal pattern and crediting requirements for grades K-12, visit the Connecticut State Department of Education's (CSDE) [Meal Patterns for Grades K-12 in School Nutrition Programs](#) and [Crediting Foods in School Nutrition Programs](#) webpages. For information on the meal pattern and crediting requirements for preschoolers, visit the CSDE's [Meal Patterns for Preschoolers in School Nutrition Programs](#) webpage.

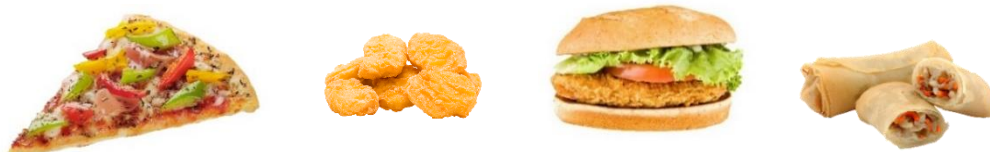


School food authorities (SFAs) must be able to document the meal pattern contribution of commercial processed foods served in school meals and ASP snacks. For example, to credit a serving of pizza as 2 ounces of the meat/meat alternates component and 2 ounce equivalents of the grains component, the manufacturer's documentation must indicate that it contains 2 ounces of cheese and 2 ounces of whole grain-rich (WGR) crust. The only acceptable types of documentation for commercial processed foods are:

- the original Child Nutrition (CN) label from the product carton or a photocopy or photograph of the CN label shown attached to the original product carton; or
- a product formulation statement (PFS) signed by an official of the manufacturer stating the amount of each meal pattern component contained in one serving of the product.

SFAs must maintain this documentation on file. The CSDE will review product documentation during the Administrative Review of the school nutrition programs.

Commercial processed products without a CN label or PFS cannot credit in school meals or ASP snacks.



Accepting Processed Product Documentation in the NSLP and SBP

PFS Forms versus CN Labels

PFS forms are not the same as CN labels. CN labels are the definitive documentation for verifying a product's crediting information for the Child Nutrition Programs. Table 1 compares the criteria for CN labels and PFS forms.

Table 1. Comparison of CN labels and PFS forms		
Requirement	CN labels ¹	PFS forms
Standard information required	✓	
Reviewed and monitored by the USDA	✓	
Includes USDA's guarantee of meal component contribution for Child Nutrition Programs	✓	
Distinct six-digit product identification number	✓	
Sponsors must check crediting information for accuracy		✓
¹ For information on CN labels, refer to the CSDE's resource, Child Nutrition (CN) Labeling Program , and visit the USDA's Food Manufacturers/Industry webpage.		

Only CN labels provide a guarantee of the product's contribution to the USDA's meal patterns for the Child Nutrition Programs. SFAs must check the crediting information on the PFS form for accuracy prior to using the product in reimbursable meals and ASP snacks.


Manufacturers are responsible for ensuring that the product is processed to meet the meal pattern contribution stated on the PFS. SFAs are responsible for verifying the crediting information on the PFS and maintaining this documentation on file for the CSDE's Administrative Review of the Child Nutrition Programs.

Accepting Processed Product Documentation in the NSLP and SBP

Child Nutrition (CN) Label

The USDA's CN Labeling Program is a voluntary federal labeling program for the Child Nutrition Programs. A CN label statement clearly identifies the contribution of a commercial product toward the meal pattern requirements, based on the USDA's evaluation of the product's formulation. CN labeling provides a warranty that the product contributes to the meal pattern requirements, as printed on the label. Table 2 shows an example of a CN label.

Table 2. Example of a CN Label

CN Label	
<div><div>1 Chicken Stir-Fry Bowl</div><div>Ingredient Statement:</div><div>2 Chicken, brown rice, broccoli, red peppers, carrots, onions, water, olive oil, soy sauce, spices.</div><div>3 CN</div><div>XXXXXX</div><div>CN Each 4.5 oz Chicken Stir-Fry Bowl provides 1.5 oz eq meat, 1.0 oz eq grains, ¼ cup dark green vegetable, ¼ cup red/orange vegetable, and ⅛ cup other vegetable for Child Nutrition Meal Pattern Requirements. (Use of this logo and statement authorized by the Food and Nutrition Service, USDA 09/16). CN</div><div>Net Wt.: 18 pounds</div><div>CN</div><div>4 </div><div>Chicken Wok Company 1234 Kluck Street • Poultry, PA 1235</div></div>	
1 Product Name	The CN Logo is the box with "CN" on each side, surrounding the meal pattern contribution statement. It is one of the four integral parts of a label (product name, ingredient statement, CN Logo, and inspection legend). All four parts must be on the product carton for the CN label to be valid.
2 Ingredient Statement	
3 CN Logo	
4 Inspection Legend	

CN labels are available only for main dish entrees that contribute to the meat/meat alternates component of the USDA's meal patterns, such as beef patties, pizza, and breaded fish portions. However, CN labels usually indicate the contribution of other meal components that are part of these products. For example, CN-labeled pizza may list contributions to the meat/meat alternates, grains, and vegetables components.

For more information, refer to the CSDE's resource, [Child Nutrition \(CN\) Labeling Program, USDA Memo SP 11-2015 \(v2\), CACFP 10-2015 and SFSP 13-2015: CN Labels Copied with a Watermark Acceptable Documentation](#), and [USDA Memo SP 27-2015, CACFP 09-2015 and SFSP 12-2015: Administrative Review Process Regarding the Child Nutrition \(CN\) Label, Watermarked CN Label and Manufacturer's Product Formulation Statement](#). The USDA's [Authorized Labels and Manufacturers](#) webpage lists approved CN-labeled products and manufacturers.

Accepting Processed Product Documentation in the NSLP and SBP

Product Formulation Statement (PFS)

A PFS is a document developed by manufacturers that provides specific information about how a product credits toward the USDA's meal patterns for Child Nutrition Programs. It generally includes a detailed explanation of what the product contains and indicates the amount of each ingredient in the product by weight. Table 3 shows an example of a completed PFS for a commercial grain product.

Information on PFS forms can vary among manufacturers because the USDA does not monitor PFS forms. The USDA's [Food Manufacturers/Industry](#) webpage provides PFS templates for the meat/meat alternates, grains, fruits, and vegetables components.

Requirements for PFS forms

PFS forms must meet the requirements below. SFAs must check the manufacturer's crediting information for accuracy prior to including the product in reimbursable meals and ASP snacks.

- The PFS must indicate how the processed product contributes to the meal pattern requirements.
- All creditable ingredients listed in the PFS must match a description in the USDA's [Food Buying Guide for Child Nutrition Programs](#). The manufacturer must clearly identify how each component contributes to the meal pattern requirements by citing specific Child Nutrition Program resources or regulations, such as the FBG and USDA policy on crediting foods (e.g., [USDA policy memos for Child Nutrition Programs](#) and [Food and Nutrition Service \(FNS\) instructions for Child Nutrition Programs](#)); and.
- The PFS should verify that the product's meal pattern contribution is not greater than the serving size of the product. For example, a 2.2-ounce beef patty cannot credit for more than 2 ounce equivalents of the meat/meat alternates component.
- The PFS should assure that the creditable components are visible in the finished product, such as sausage links, beans, cheese, or peanut butter. The PFS must also specify the method for crediting these items.



The USDA requires that foods must be visible (recognizable) to credit toward the meal patterns. The intent for this requirement is to ensure that children can easily identify the foods in reimbursable meals and ASP snacks. The nutrition education aspect of the Child Nutrition Programs includes the goal of helping children recognize the food groups that contribute to healthy meals and snacks.

Accepting Processed Product Documentation in the NSLP and SBP

- The PFS must be prepared on company letterhead with the signature of a company official and the date of issue. The signature can be handwritten, stamped, or electronic.
- Manufacturers may modify the USDA's PFS forms for various products that contribute to more than one meal component. For example, cheese pizza could have crediting information for the red/orange vegetable subgroup in addition to the meat/meat alternates and grains components. Manufacturers may use one PFS to document the crediting information for all meal components in a product.


PFS forms that do not meet these requirements cannot be accepted as crediting documentation. SFAs must request a revised PFS (and supporting documentation if needed) from the manufacturer.

For detailed guidance on PFS forms, refer to the CSDE's resource, [Product Formulation Statements](#), and the USDA's [Tips for Evaluating a Manufacturer's Product Formulation Statement](#). Additional guidance is available in the "[Crediting Commercial Processed Products for Grades K-12 in School Nutrition Programs](#)" and "[Crediting Commercial Processed Products in Preschool Menus](#)" sections of the CSDE's school nutrition programs webpages.



Accepting Processed Product Documentation in the NSLP and SBP

Table 3. Sample completed PFS for a commercial grain product



United States Department of Agriculture

Food and Nutrition Service

**Product Formulation Statement for Documenting Grains
in Child Nutrition Programs**

(Crediting Standards Based on Grams of Creditable Grains (ounce equivalents))

Child Nutrition (CN) Program Operators should include a copy of the label from the purchased product package in addition to the following information on letterhead signed by an official company representative. CN Program Operators have the option to choose the crediting method that best fits their specific needs for menu planning.

Product Name: Wheat Smile Pancakes Code No.: 123456

Manufacturer: ABC Bread Company Serving Size: 2 pancakes: 50 grams (1.75 ounces)
(raw dough weight may be used to calculate creditable grain amount)

I. Does the product meet the Whole Grain-Rich Criteria: Yes ☒ No ☐

II. Does the product contain non-creditable grains: Yes ☐ No ☒ How many grams:
(Products with more than 0.24 ounce (oz.) equivalent (eq.) or 3.99 grams (g) for Groups A-G or 6.99g for Groups H and I of non-creditable grains may not credit towards the grain requirements for school meals.)

III. Use Exhibit A: Grain Requirements for Child Nutrition Programs in the FBG to determine if the product fits into Groups A-G (baked goods), Group H (cereal grains) or Group I (RTE breakfast cereals). (Different methodologies are applied to calculate servings of grain component based on creditable grains. Groups A-G use the standard of 16g creditable grain per oz. eq.; Group H uses the standard of 28g creditable grain per oz. eq.; and Group I is reported by volume or weight.)

Indicate to which Exhibit A Group (A-I) the Product Belongs: C

DESCRIPTION OF CREDITABLE GRAIN INGREDIENT*	GRAMS OF CREDITABLE GRAIN INGREDIENT PER PORTION ¹	GRAM STANDARD OF CREDITABLE GRAIN PER OZ. EQUIVALENT (16g or 28g) ²	CREDITABLE AMOUNT
	A	B	A ÷ B
Whole-wheat flour (47%)	23.5	16	1.4687
Enriched flour (22%)	11	16	0.6875
Total			2.1562
Total Creditable Amount³			2.0

* Creditable grains vary by CN Program. See the FBG for specific Program requirements.
¹ (Serving size) X (% of creditable grain in formula). Please be aware that serving sizes other than grams must be converted to grams.
² Standard grams of creditable grains from the corresponding Group in Exhibit A.
³ Total Creditable Amount must be rounded **down** to the nearest quarter (0.25) oz. eq. Do **not** round up.

Total weight (per portion) of product as purchased 1.75 ounces

Total contribution of product (per portion) 2 oz. eq.

I certify that the above information is true and correct and that a 1.75 ounce portion of this product (ready for serving) provides 2 oz. eq. grains. I further certify that non-creditable grains **are not** above 0.24 oz. eq. per portion. Products with more than 0.24 oz. eq. or 3.99g for Groups A-G or 6.99g for Groups H and I of non-creditable grains may not credit towards the grain requirements for school meals.

John Smith

Signature

John Smith

Printed Name

President, ABC Bread Company

Title

11/3/2020

Date

123-456-7890

Phone Number

November 2019

Accepting Processed Product Documentation in the NSLP and SBP

Resources

Afterschool Snack Program Handbook (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/ASP/ASP_Handbook.pdf

Authorized Manufacturers and Labels (USDA webpage):

<https://www.fns.usda.gov/cnlabeling/usdausdc-authorized-labels-and-manufacturers>

Child Nutrition (CN) Labeling Program (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/CN_Labeling_Program.pdf

Child Nutrition (CN) Labeling Program (USDA webpage):

<https://www.fns.usda.gov/cn/labeling-program>

Crediting Commercial Processed Products in Preschool Menus (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-Preschoolers-in-School-Nutrition-Programs/Related-Resources#CommercialProducts>

Crediting Commercial Processed Products in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-School-Nutrition-Programs#CommercialProducts>

Crediting Summary Charts for the Meal Patterns for Grades K-12 in the School Nutrition Programs (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/Crediting_Summary_Charts_SNP_Grades_K-12.pdf

Crediting Summary Charts for the Preschool Meal Patterns of the School Nutrition Programs (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/Crediting_Summary_Charts_SNP_Preschool.pdf

Food Buying Guide for Child Nutrition Programs (USDA):

<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>

Food Manufacturers/Industry (USDA webpage):

<https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry>

Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-School-Nutrition-Programs>

Meal Patterns for Preschoolers in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-Preschoolers-in-School-Nutrition-Programs/Documents>

Menu Planning Guide for Preschoolers in the NSLP and SBP (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Preschool/Menu_Planning_Guide_Preschool.pdf

Accepting Processed Product Documentation in the NSLP and SBP

Menu Planning Guide for School Meals for Grades K-12 (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Menu-Planning-Guide-for-School-Meals>

Product Formulation Statements (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/Product_Formulation_Statements.pdf

Resources for the Preschool Meal Patterns (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Preschool/Resources_Preschool_Meal_Patterns.pdf

Resources for the School Meal Patterns for Grades K-12 (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/MealPattern/Resources_School_Meal_Patterns_grades_K-12.pdf

Reviewer's Checklist for Evaluating Manufacturer Product Formulation Statements for Meat/Meat Alternates (USDA):

https://fns-prod.azureedge.net/sites/default/files/reviewer_checklist.pdf

Tips for Evaluating a Manufacturer's Product Formulation Statement (USDA):

<https://fns-prod.azureedge.net/sites/default/files/resource-files/manufacturePFStipsheet.pdf>

Accepting Processed Product Documentation in the NSLP and SBP



For more information, refer to the CSDE's guides, *Menu Planning Guide for School Meals for Grades K-12* and *Menu Planning Guide for Preschoolers in the NSLP and SBP*, or contact the [school nutrition programs staff](#) in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/Accepting_Processed_Product_Documentation_SNP.pdf.

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- (1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

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